

# EXHIBIT B-1

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO

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In re:

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et*  
*al.*,

Debtors.<sup>1</sup>

PROMESA  
Title III  
No. 17 BK 3283-LTS  
(Jointly Administered)

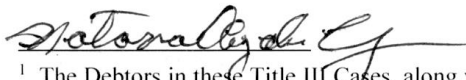
**This filing relates to the  
Commonwealth, ERS, HTA,  
and PBA.**

**DECLARATION OF JAY HERRIMAN IN SUPPORT OF THE THREE HUNDRED  
EIGHTIETH OMNIBUS OBJECTION (SUBSTANTIVE) OF THE COMMONWEALTH  
OF PUERTO RICO, THE EMPLOYEES RETIREMENT SYSTEM OF THE  
GOVERNMENT OF THE COMMONWEALTH OF PUERTO RICO, THE PUERTO  
RICO HIGHWAYS AND TRANSPORTATION AUTHORITY, AND THE PUERTO  
RICO PUBLIC BUILDINGS AUTHORITY TO EMPLOYEE CLAIMS ASSERTING  
LIABILITIES OWED BY ENTITIES THAT ARE NOT TITLE III DEBTORS**

I, Jay Herriman, pursuant to 28 U.S.C. § 1746, hereby declare under penalty of perjury that  
the following is true and correct to the best of my knowledge, information and belief:

1. I am a Managing Director of Alvarez & Marsal North America, LLC ("A&M").

The Financial Oversight and Management Board for Puerto Rico (the "Oversight Board") retained



<sup>1</sup> The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the "Commonwealth") (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority ("PBA", and together with the Commonwealth, COFINA, HTA, ERS, and PREPA, the "Debtors") (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

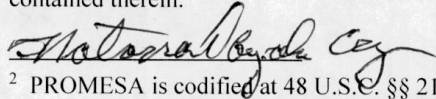


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A&M to assist with, *inter alia*, the claims reconciliation process for the Debtors' (as defined below) cases filed pursuant to the *Puerto Rico Oversight, Management, and Economic Stability Act* ("PROMESA").<sup>2</sup> Unless otherwise stated in this declaration, I have personal knowledge of the facts set forth herein.

2. In my capacity as a Managing Director of A&M, I am one of the persons responsible for overseeing the claims reconciliation and objection process in the Debtors' cases filed pursuant to PROMESA. The Debtors' ongoing claims reconciliation process involves the collective effort of a team of A&M employees, as well as Proskauer Rose LLP and O'Neill & Borges LLC, counsel for the Oversight Board, the legal representative for the Commonwealth of Puerto Rico (the "Commonwealth"), the Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS"), the Puerto Rico Highways and Transportation Authority ("HTA"), and the Puerto Rico Public Buildings Authority ("PBA," and together with the Commonwealth, ERS, and HTA, the "Debtors").

3. I submit this declaration in support of the *Three Hundred Eightieth Omnibus Objection (Substantive) of the Commonwealth of Puerto Rico, the Employees Retirement System of the Government of the Commonwealth of Puerto Rico, the Puerto Rico Highways and Transportation Authority, and the Puerto Rico Public Buildings Authority to Employee Claims Asserting Liabilities Owed by Entities That Are Not Title III Debtors* (the "Three Hundred Eightieth Omnibus Objection").<sup>3</sup> I have personally reviewed the Three Hundred Eightieth Omnibus Objection and exhibits thereto and am, accordingly, familiar with the information contained therein.



<sup>2</sup> PROMESA is codified at 48 U.S.C. §§ 2101-2241.

<sup>3</sup> Capitalized terms not otherwise defined herein shall have the meanings given to such terms in the Three Hundred Eightieth Omnibus Objection.

SRF 56032

Hearing Date: October 6, 2021 at 9:30AM (Atlantic Standard Time)  
Response Deadline: September 20, 2021 at 4:00PM (Atlantic Standard Time)

PLEASE CAREFULLY REVIEW THIS OBJECTION AND THE ATTACHMENTS HERETO  
TO DETERMINE WHETHER THE OBJECTION AFFECTS YOUR CLAIM(S).

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO

In re:

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et*  
*al.*,

Debtors.<sup>1</sup>

PROMESA  
Title III

No. 17 BK 3283-LTS

(Jointly Administered)

**This filing relates to the  
Commonwealth, ERS, HTA,  
and PBA.**

**THREE HUNDRED EIGHTIETH OMNIBUS OBJECTION (SUBSTANTIVE)  
OF THE COMMONWEALTH OF PUERTO RICO, THE EMPLOYEES RETIREMENT  
SYSTEM OF THE GOVERNMENT OF THE COMMONWEALTH OF PUERTO RICO,  
THE PUERTO RICO HIGHWAYS AND TRANSPORTATION AUTHORITY, AND THE  
PUERTO RICO PUBLIC BUILDINGS AUTHORITY TO EMPLOYEE CLAIMS  
ASSERTING LIABILITIES OWED BY ENTITIES THAT ARE NOT TITLE III  
DEBTORS**



<sup>1</sup> The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the "Commonwealth") (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority ("PBA", and together with the Commonwealth, COFINA, HTA, ERS, and PREPA, the "Debtors") (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

To the Honorable United States District Court Judge Laura Taylor Swain:

The Commonwealth of Puerto Rico (the “Commonwealth”), the Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”), the Puerto Rico Highways and Transportation Authority (“HTA”), and the Puerto Rico Public Buildings Authority (“PBA,” and together with the Commonwealth, ERS, and HTA, the “Debtors”), by and through the Financial Oversight and Management Board for Puerto Rico (the “Oversight Board”), as the Debtors’ sole Title III representative pursuant to section 315(b) of the *Puerto Rico Oversight, Management, and Economic Stability Act* (“PROMESA”),<sup>2</sup> file this three hundred eightieth omnibus objection (the “Three Hundred Eightieth Omnibus Objection”) seeking to disallow the proofs of claim listed on Exhibit A hereto, each of which asserts liabilities associated with allegedly unpaid wages or other employment benefits purportedly owed by entities that are not Title III debtors, but which fails to comply with the applicable rules by not providing a basis for purporting to assert a claim against the Commonwealth, ERS, HTA, PBA, or any other Title III Debtor. In support of the Three Hundred Eightieth Omnibus Objection, the Debtors respectfully represent as follows:

**JURISDICTION**

1. The United States District Court for the District of Puerto Rico has subject matter jurisdiction to consider this matter and the relief requested herein pursuant to PROMESA section 306(a).
2. Venue is proper in this district pursuant to PROMESA section 307(a).



<sup>2</sup> PROMESA is codified at 48 U.S.C. §§ 2101-2241.

I, Jay Herriman, pursuant to Title 28 U.S.C. § 1746, do hereby declare under penalty of perjury that the following is true and correct to the best of my knowledge and belief:

1. I am a Managing Director of Alvarez & Marsal North America, LLC ("A&M"). The Financial Oversight and Management Board for Puerto Rico (the "Oversight Board") retained A&M to assist with, among other things, the claims reconciliation process in connection with the Debtors' cases (as defined below) filed under the *Puerto Rico Oversight, Management and Economic Stability Act* ("PROMESA").<sup>2</sup> Except as otherwise provided in this declaration, I have personal knowledge of the facts set forth herein.

2. In my capacity as Managing Director of A&M, I am one of the individuals responsible for overseeing the reconciliation and objections process relating to claims in the Debtors' PROMESA cases. The Debtors' ongoing claims reconciliation process involves a collective effort by a team of A&M employees, as well as Proskauer Rose LLP and O'Neill & Borges LLC, counsel for the Oversight Board, the legal representative of the Commonwealth of Puerto Rico (the "Commonwealth"), the Employees' Retirement System of the Government of the Commonwealth of Puerto Rico (the "ERS") and the Puerto Rico Public Buildings Authority (the "PBA", and together with the Commonwealth, ERS, and HTA, the "Debtors").

3. I submit this declaration in support of the *Three Hundred and Eightieth Omnibus Objection (Substantive) of the Commonwealth of Puerto Rico, the Commonwealth of Puerto Rico Government*

[Signature]

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<sup>2</sup> PROMESA is codified under Title 48 U.S.C., §§ 2101-2241.

*Employees Retirement System, the Puerto Rico Highways and Transportation Authority, and the Puerto Rico Public Buildings Authority to Employee Claims Asserting Liabilities Owed by Entities That Are Not Title III Debtors* (the "Three Hundred and Eightieth Omnibus Objection").<sup>3</sup> I have personally reviewed the Three Hundred and Eightieth Omnibus Objection and exhibits thereto and am, accordingly, familiar with the information contained therein.

4. In preparation for filing the Three Hundred and Eightieth Omnibus Objection, and under my direction and/or supervision, each of the claims at issue in the Three Hundred and Eightieth Omnibus Objection was carefully reviewed and analyzed in good faith applying due diligence by the relevant staff or was reviewed and analyzed by the staff of other agents hired by the Oversight Board. Such efforts resulted in the identification of claims to be disallowed, as identified in **Exhibit A** to the Three hundred and Eightieth Omnibus Objection.

5. To the best of my knowledge, each of the claims identified in **Exhibit A** to the Three Hundred and Eightieth Omnibus Objection (collectively, the "Claims to be Disallowed") alleges liability for alleged unpaid wages or other employment benefits allegedly owed by the entities that are not Title III Debtors. The Claims to be disallowed allege liability for unpaid wages or other labor benefits allegedly owed by the Housing Finance Authority, the Puerto Rico Sugar Corporation, the Puerto Rico Telephone Company. However, none of these entities are Title III Debtors. For example, the Administration [...]

[Signature]

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<sup>3</sup> Capitalized terms not otherwise defined herein shall have the meanings given to such terms in the Three hundred and Eightieth Omnibus Objection

Hearing date: October 6, 2021, at 9:30 a.m. (AST)  
Deadline to respond: September 20, 2021, at 4:00 p.m. (AST)

<b>REVIEW THIS OBJECTION AND THE ENCLOSED DOCUMENTS THOROUGHLY IN ORDER TO DETERMINE WHETHER THIS OBJECTION AFFECTS YOUR CLAIM(S)</b>
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**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

*In re:*

PROMESA  
Title III

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO,

No. 17 BK 3283-LTS

as representative of

(Jointly Administered)

THE COMMONWEALTH OF PUERTO RICO,  
*et al.*,

**This filing relates to the  
Commonwealth, ERS, and PBA.**

Debtors.<sup>1</sup>

**THREE HUNDRED AND EIGHTIETH OMNIBUS OBJECTION (SUBSTANTIVE) OF  
THE COMMONWEALTH OF PUERTO RICO, THE COMMONWEALTH OF PUERTO  
RICO GOVERNMENT EMPLOYEES' RETIREMENT SYSTEM, THE PUERTO RICO  
HIGHWAYS AND TRANSPORTATION AUTHORITY, AND THE PUERTO RICO  
PUBLIC BUILDINGS AUTHORITY TO EMPLOYEE CLAIMS ASSERTING  
LIABILITIES OWED BY ENTITIES THAT ARE NOT TITLE III DEBTORS**

[Signature]\_\_\_\_\_

<sup>1</sup> The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are (i) the Commonwealth of Puerto Rico (the "Commonwealth") (Bankruptcy Case No. 17 BK 3283- LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Commonwealth of Puerto Rico Government Employees' Retirement System ("ERS") (Bankruptcy Case No. 17 BK 3566- LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority ("PBA", and together with the Commonwealth, COFINA, HTA, ERS, and PREPA, the "Debtors") (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations.)

To the Honorable United States District Court Judge Laura Taylor Swain:

The Commonwealth of Puerto Rico (the “Commonwealth”), the Commonwealth of Puerto Rico Government Employees’ Retirement System (“ERS”), the Puerto Rico Highways and Transportation Authority (the “HTA”) and the Puerto Rico Public Buildings Authority (the “PBA,” and together with the Commonwealth, the ERS, and the HTA, the “Debtors”), by and through the Financial Oversight and Management Board for Puerto Rico (the “Oversight Board”), as the Debtors’ sole Title III representative pursuant to section 315(b) of the *Puerto Rico Oversight, Management, and Economic Stability Act* (“PROMESA”)<sup>2</sup> file this three hundred AND eightieth omnibus objection (the “Three Hundred and Eightieth Omnibus Objection”) seeking to disallow the proofs of claim listed on Exhibit A hereto, each asserting liabilities associated with allegedly unpaid wages or other employment benefits purportedly owed by entities that are not Title III debtors, but failing to comply with the applicable rules by not providing a basis for purporting to assert a claim against the Commonwealth, ERS, PBA, or any other Title III Debtor. In support of the Three hundred and eightieth Omnibus Objection, the Debtors respectfully represent as follows:

### **JURISDICTION**

1 The United States District Court for the District of Puerto Rico has subject matter jurisdiction to consider this matter and the relief requested herein pursuant to PROMESA section 306(a).

[Signature]\_\_\_\_\_

<sup>2</sup> PROMESA is codified under Title 48 U.S.C., §§ 2101-2241.

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO

*In re:*

PROMESA  
Title III

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO,

No. 17 BK 3283-LTS

as representative of

(Jointly Administered)

THE COMMONWEALTH OF PUERTO RICO,  
*et al.*,

**This filing relates to the  
Commonwealth, ERS, and PBA.**

Debtors.

**NOTICE OF THE THREE HUNDRED AND EIGHTIETH OMNIBUS OBJECTION  
(SUBSTANTIVE) OF THE COMMONWEALTH OF PUERTO RICO, THE  
EMPLOYEES' RETIREMENT SYSTEM OF THE GOVERNMENT OF THE  
COMMONWEALTH OF PUERTO RICO, THE PUERTO RICO HIGHWAYS AND  
TRANSPORTATION AUTHORITY, AND THE PUERTO RICO PUBLIC BUILDINGS  
AUTHORITY TO EMPLOYEE CLAIMS ASSERTING LIABILITIES OWED BY  
ENTITIES THAT ARE NOT TITLE III DEBTORS**

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**IF YOUR CLAIM IS LISTED ON EXHIBIT A TO THE OMNIBUS OBJECTION, THE DEBTORS ARE SEEKING TO DISALLOW YOUR CLAIM BECAUSE THEY ARE NOT LIABLE FOR YOUR CLAIM.**

**THIS OMNIBUS OBJECTION SEEKS TO ALTER YOUR RIGHTS. ANY CLAIM THAT IS DISALLOWED WILL BE TREATED AS THOUGH IT WERE NEVER FILED.**

**IF YOUR CLAIM IS LISTED ON EXHIBIT A, YOU SHOULD READ THIS NOTICE AND THE OMNIBUS OBJECTION CAREFULLY AND DISCUSS IT WITH YOUR ATTORNEY. IF YOU DO NOT HAVE AN ATTORNEY, YOU MAY WISH TO CONSULT ONE.**

**PLEASE TAKE NOTICE THAT** on August 20, 2021, the Commonwealth of Puerto Rico (the "Commonwealth"), the Commonwealth of Puerto Rico Government Employees' Retirement System ("ERS"), the Puerto Rico Highways and Transportation Authority (the "HTA"), and the Puerto Rico Public Buildings Authority (the "PBA," and together with the Commonwealth, the ERS, and the HTA, the "Debtors"), by and through the Financial Oversight and Management Board for Puerto Rico (the "Oversight Board"), as the representative of the Commonwealth pursuant to section 315(b) of the *Puerto Rico*

*Oversight, Management, and Economic Stability Act ("PROMESA"),<sup>1</sup> filed the Three hundred and eightieth Omnibus Objection (Substantive) of the Commonwealth of Puerto Rico, the Commonwealth of Puerto Rico Government Employees' Retirement System, and the Puerto Rico Public Buildings Authority to Employee Claims Asserting Liabilities Owed by Entities That Are Not Title III Debtors (the "Omnibus Objection") with the United States District Court for the District of Puerto Rico (the "Court").<sup>2</sup>*

**OVERVIEW**

- **PLEASE CHECK IF YOUR CLAIM(S) IS/ARE LISTED ON EXHIBIT A TO THE OMNIBUS OBJECTION.**
- **If your claim(s) are NOT listed on Exhibit A, the Omnibus Objection will not affect your claim, and you DO NOT have to do anything.**
- If your claim(s) is/are listed on Exhibit A to the Omnibus Objection, the Debtors are seeking to disallow your claim(s) listed on Exhibit A because, as explained in the accompanying Omnibus Objection, the Debtors believe they are not liable for your claim(s). The Omnibus Objection and Exhibit A to the Omnibus Objection provide additional details regarding why the Debtors believe they are not liable.
- Copies of the Omnibus Objection and all other filings in the Title III Cases are available free online at <https://cases.primeclerk.com/puertorico>
- **If you have questions, please contact Prime Clerk, LLC at (844) 822-9231 (toll free for U.S. and Puerto Rico) or (646) 486-7944 (for international callers), available 10:00 a.m. to 7:00 p.m. (Atlantic Standard Time) (Spanish available).**

**IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF DEMANDED BY THE OMNIBUS OBJECTION WITHOUT FURTHER NOTICE OR HEARING.**

*[Additional pages follow]*

[Signature]\_\_\_\_\_

<sup>1</sup> PROMESA is codified under Title 48 U.S.C., §§ 2101-2241.

<sup>2</sup> Capitalized terms used but not defined herein shall have the meanings set forth in the Omnibus Objection.

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO

In re:

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et*  
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Debtors.

PROMESA  
Title III

No. 17 BK 3283-LTS

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**This filing relates to the  
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**NOTICE OF THE THREE HUNDRED EIGHTIETH OMNIBUS OBJECTION  
(SUBSTANTIVE) OF THE COMMONWEALTH OF PUERTO RICO, THE  
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TRANSPORTATION AUTHORITY, AND THE PUERTO RICO PUBLIC BUILDINGS  
AUTHORITY TO EMPLOYEE CLAIMS ASSERTING LIABILITIES OWED BY  
ENTITIES THAT ARE NOT TITLE III DEBTORS**

**IF YOUR CLAIM IS LISTED ON EXHIBIT A TO THE OMNIBUS OBJECTION, THE  
DEBTORS ARE SEEKING TO DISALLOW YOUR CLAIM BECAUSE THEY ARE NOT  
LIABLE FOR YOUR CLAIM.**

**THIS OMNIBUS OBJECTION SEEKS TO ALTER YOUR RIGHTS. ANY CLAIM THAT  
IS DISALLOWED WILL BE TREATED AS THOUGH IT WERE NEVER FILED.**

**IF YOUR CLAIM IS LISTED ON EXHIBIT A, YOU SHOULD READ THIS NOTICE AND  
THE OMNIBUS OBJECTION CAREFULLY AND DISCUSS IT WITH YOUR  
ATTORNEY. IF YOU DO NOT HAVE AN ATTORNEY, YOU MAY WISH TO  
CONSULT ONE.**

**PLEASE TAKE NOTICE THAT**, on August 20, 2021, the Commonwealth of Puerto Rico (the "Commonwealth"), the Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS"), the Puerto Rico Highways and Transportation Authority ("HTA"), and the Puerto Rico Public Buildings Authority ("PBA," and together with the Commonwealth, ERS, and HTA, the "Debtors"), by and through the Financial Oversight and Management Board for Puerto Rico (the "Oversight Board"), as the representative of the Commonwealth pursuant to Section 315(b) of the *Puerto Rico Oversight, Management, and*

*Economic Stability Act (“PROMESA”),<sup>1</sup> filed the Three Hundred Eightieth Omnibus Objection (Substantive) of the Commonwealth of Puerto Rico, the Employees Retirement System of the Government of the Commonwealth of Puerto Rico, the Puerto Rico Highways and Transportation Authority, and the Puerto Rico Public Buildings Authority to Employee Claims Asserting Liabilities Owed by Entities That Are Not Title III Debtors (the “Omnibus Objection”) with the United States District Court for the District of Puerto Rico (the “Court”).<sup>2</sup>*

**OVERVIEW**

- **PLEASE CHECK IF YOUR CLAIM(S) IS/ARE LISTED ON EXHIBIT A TO THE OMNIBUS OBJECTION.**
- **If your claim(s) is/are NOT listed on Exhibit A, your claim will not be affected by the Omnibus Objection, and you DO NOT have to do anything.**
- If your claim(s) is/are listed on Exhibit A to the Omnibus Objection, the Debtors are seeking to disallow your claim(s) listed on Exhibit A because, as explained in the accompanying Omnibus Objection, the Debtors believe they are not liable for your claim(s). The Omnibus Objection and Exhibit A to the Omnibus Objection provide additional details regarding why the Debtors believe they are not liable.
- Copies of the Omnibus Objection and all other filings in the Title III Cases are available free online at <https://cases.primeclerk.com/puertorico>.
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**IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF DEMANDED BY THE OMNIBUS OBJECTION WITHOUT FURTHER NOTICE OR HEARING.**

[Additional pages follow]



<sup>1</sup> PROMESA is codified at 48 U.S.C. §§ 2101-2241.

<sup>2</sup> Capitalized terms used but not defined herein shall have the meanings set forth in the Omnibus Objection.

2. Venue is proper in this district pursuant to PROMESA section 307(a)

## **BACKGROUND**

### **A. Deadline Orders**

3. On May 3, 2017, the Oversight Board issued a restructuring certification pursuant to sections 104(j) and 206 of PROMESA and filed a voluntary petition for relief for the Commonwealth pursuant to section 304(a) of PROMESA, initiating a case under Title III of that body of law (the "Commonwealth Title III Case"). On May 21, 2017, the Oversight Board issued a restructuring certification pursuant to sections 104(j) and 206 of PROMESA and filed a voluntary petition for relief for the ERS pursuant to section 304(a) of PROMESA, initiating a case under Title III of that body of law (the "ERS Title III Case" and the "ACT Title III Case," respectively). On September 27, 2019, the Oversight Board issued a restructuring certification pursuant to sections 104(j) and 206 of PROMESA and filed a voluntary petition for relief for the PBA pursuant to section 304(a) of PROMESA, initiating a case under Title III of that body of law (the "PBA Title III Case," and together with the Commonwealth Title III Case and the ERS Title III Case, the "Title III Cases"). On June 29, 2017, and October 9, 2019, the Court entered orders granting joint administration of the Title III Cases for procedural purposes only. ECF no. 537, ECF no. 8829.<sup>3</sup>

[Signature]

<sup>3</sup> Except as otherwise provided herein, ECF citations shall refer to documents filed in Bankruptcy Case No. 17 BK 3283-LTS.

4. On January 16, 2018, the Debtors filed their *Motion for an Order A) setting deadlines and procedures for filing proofs of claim and B) approving the form and manner of service thereof* [ECF no. 2255] (the "Deadline Motion"). Pursuant to the *Order A) setting deadlines and procedures for filing proofs of claim and B) approving the form and manner of service thereof* [ECF. no. 2521] (the "Initial Deadline Order"), the Court granted the relief requested in the Deadline Motion and set deadlines and procedures for filing evidence of claims under the Title III Cases. Following the informational motion of certain creditors, and the Debtors' support, the Court thereafter entered the *Order A) setting deadlines and procedures for filing proofs of claim and B) approving the form and manner of service thereof* [ECF no. 3160] (together with the Initial Deadline Order, the "Commonwealth, ERS and ACT Deadline Orders"), extending said deadlines to June 29, 2018, 04:00 p.m. (AST).

5. On February 11, 2020, the PBA filed its *Motion for an Order A) setting deadlines and procedures for filing proofs of claim and B) approving the form and manner of service thereof*. [ECF no. 36 in 19-BK-5523-LTS] (the "PBA Motion for Deadline"). Pursuant to the *Order A) setting deadlines and procedures for filing proofs of claim and B) approving the form and manner of service thereof* [ECF. no. 55 in 19-BK- 5523-LTS] (the "PBA Initial Deadline Order"), the Court granted the relief requested in the PBA's Motion for Deadline and set deadlines and procedures for filing proofs of claim under the PBA's Title III Case. In view of the public health emergency caused by the spread of COVID-19, the Court subsequently extended this deadline until July 29, 2020 (inclusive) at 4:00 p.m. (AST) by way of the *Order A) setting deadlines and procedures for filing proofs of claim and B)*

Commonwealth of Puerto Rico (the “Commonwealth”), the Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”), the Puerto Rico Highways and Transportation Authority (“HTA”), and the Puerto Rico Public Buildings Authority (“PBA,” and together with the Commonwealth, ERS, and HTA, the “Debtors”), dated August 20, 2021, for entry of an order disallowing in their entirety certain claims filed against the Debtors, as more fully set forth in the Three Hundred Eightieth Omnibus Objection and supporting exhibits thereto; and the Court having jurisdiction to consider the Three Hundred Eightieth Omnibus Objection and to grant the relief requested therein pursuant to PROMESA section 306(a); and venue being proper pursuant to PROMESA section 307(a); and due and proper notice of the Three Hundred Eightieth Omnibus Objection having been provided to those parties identified therein, and no other or further notice being required; and each of the claims identified in Exhibit A to the Three Hundred Eightieth Omnibus Objection (collectively, the “Claims to Be Disallowed”) having been found to be claims for which the Debtors are not liable; and the Court having determined that the relief sought in the Three Hundred Eightieth Omnibus Objection is in the best interests of the Debtors, their creditors, and all parties in interest; and the Court having determined that the legal and factual bases set forth in the Three Hundred Eightieth Omnibus Objection establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor, it is hereby

ORDERED that the Three Hundred Eightieth Omnibus Objection is GRANTED as set forth herein; and it is further

ORDERED that the Claims to Be Disallowed are hereby disallowed in their entirety; and it is further

ORDERED that Prime Clerk, LLC, is authorized and directed to delete the Claims to Be Disallowed from the official claims registry in the Title III Cases; and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation, or enforcement of this Order.

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO

In re:

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*,  
Debtors.<sup>1</sup>

PROMESA

Title III

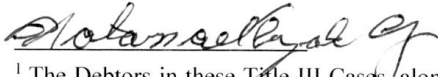
No. 17 BK 3283-LTS

(Jointly Administered)

**This filing relates to the  
Commonwealth, ERS, HTA,  
and PBA.**

ORDER GRANTING THREE HUNDRED EIGHTIETH OMNIBUS OBJECTION  
(SUBSTANTIVE) OF THE COMMONWEALTH OF PUERTO RICO, THE EMPLOYEES  
RETIREMENT SYSTEM OF THE GOVERNMENT OF THE COMMONWEALTH OF  
PUERTO RICO, THE PUERTO RICO HIGHWAYS AND TRANSPORTATION  
AUTHORITY, AND THE PUERTO RICO PUBLIC BUILDINGS AUTHORITY TO  
EMPLOYEE CLAIMS ASSERTING LIABILITIES OWED BY ENTITIES THAT ARE NOT  
TITLE III DEBTORS

Upon the *Three Hundred Eightieth Omnibus Objection (Substantive) of the  
Commonwealth of Puerto Rico, the Employees Retirement System of the Government of the  
Commonwealth of Puerto Rico, the Puerto Rico Highways and Transportation Authority, and the  
Puerto Rico Public Buildings Authority to Employee Claims Asserting Liabilities Owed by Entities  
That Are Not Title III Debtors* (the "Three Hundred Eightieth Omnibus Objection"),<sup>2</sup> filed by the



<sup>1</sup> The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the "Commonwealth") (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority ("PBA", and together with the Commonwealth, COFINA, HTA, ERS, and PREPA, the "Debtors") (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

<sup>2</sup> Capitalized terms not otherwise defined herein shall have the meanings given to such terms in the Three Hundred Eightieth Omnibus Objection.

omnibus objection"),<sup>2</sup> filed against the Commonwealth of Puerto Rico (the "Commonwealth"), the Commonwealth of Puerto Rico Government Employees' Retirement System ("ERS"), the Puerto Rico Highways and Transportation Authority ("HTA"), and the Puerto Rico Public Buildings Authority ("PBA", and together with the Commonwealth, ERS, and HTA, the "Debtors"), dated August 20, 2021, for an order disallowing in their entirety certain claims filed against the Debtors, as more fully set forth in the Three Hundred and Eightieth Omnibus Objection and supporting exhibits thereto; and the Court having jurisdiction to hear the Three Hundred and Eightieth Omnibus Objection and to grant the relief requested therein pursuant to PROMESA section 306(a); and venue being proper pursuant to PROMESA section 307(a); and due and proper notice of the Three Hundred and Eightieth Omnibus Objection having been provided to those parties identified therein, and no other or further notice being required; and each of the claims identified in Exhibit A to the Three Hundred and Eightieth Omnibus Objection (collectively, the "Claims to Be Disallowed") having been found to be claims for which the Debtors are not liable; and the Court having determined that the relief sought in the Three Hundred and Eightieth Omnibus Objection is in the best interests of the Debtors, their creditors, and all parties in interest; and the Court having determined that the legal and factual bases set forth in the Three Hundred and Eightieth Omnibus Objection establish just cause for the relief granted herein; and after due deliberation and sufficient cause found, it is hereby [...]

[signature]\_\_\_\_\_

<sup>2</sup> Capitalized terms not otherwise defined herein shall have the meanings given to such terms in the Three hundred and eightieth Omnibus Objection

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO

*In re:*

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO,

PROMESA  
Title III  
No. 17 BK 3283-LTS  
(Jointly Administered)

as representative of

**This filing relates to the  
Commonwealth, ERS, HTA and PBA.**

THE COMMONWEALTH OF PUERTO RICO,  
*et al.*,

Debtors.<sup>1</sup>

ORDER GRANTING THE THREE HUNDRED EIGHTIETH OMNIBUS OBJECTION  
(SUBSTANTIVE) OF THE COMMONWEALTH OF PUERTO RICO, THE EMPLOYEES'  
RETIREMENT SYSTEM OF THE GOVERNMENT OF THE COMMONWEALTH OF  
PUERTO RICO, THE PUERTO RICO HIGHWAYS AND TRANSPORTATION  
AUTHORITY, AND THE PUERTO RICO PUBLIC BUILDINGS AUTHORITY TO  
EMPLOYEE CLAIMS ASSERTING LIABILITIES OWED BY ENTITIES THAT ARE NOT  
TITLE III DEBTORS

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Having heard the *Three Hundred and Eightieth Omnibus Objection (substantive) of the Commonwealth of Puerto Rico, the Employees' Retirement System of the Government of the Commonwealth of Puerto Rico, the Highways and Transportation Authority, and the Puerto Rico Public Buildings Authority to employee claims alleging liabilities of entities that are not Title III Debtors (the "Three Hundred and Eightieth [...])*

[Signature]

<sup>1</sup> The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the "Commonwealth") (Bankruptcy Case No. 17 BK 3283- LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Commonwealth of Puerto Rico Government Employees' Retirement System ("ERS") (Bankruptcy Case No. 17 BK 3566- LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority ("PBA", and together with the Commonwealth, COFINA, HTA, ERS, and PREPA, the " Debtors") (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

requested in the Bar Date Motion and established deadlines and procedures for filing proofs of claim in the Title III Cases. Upon the informative motion of certain creditors, and the support of the Debtors, the Court subsequently entered the *Order (A) Extending Deadlines for Filing Proofs of Claim and (B) Approving Form and Manner of Notice Thereof* [ECF No. 3160] (together with the Initial Bar Date Order, the “Commonwealth, ERS, and HTA Bar Date Orders”), extending these deadlines to June 29, 2018 at 4:00 p.m. (Atlantic Time).

5. On February 11, 2020, PBA filed its *Motion for Order (A) Establishing Deadlines and Procedures for Filing Proofs of Claim and (B) Approving Form and Manner of Notice Thereof* [ECF No. 36 in 19-BK-5523-LTS] (the “PBA Bar Date Motion”). Pursuant to the *Order (A) Establishing Deadlines and Procedures for Filing Proofs of Claims and (B) Approving Form and Manner of Notice Thereof* [ECF No. 55 in 19-BK-5523-LTS] (the “Initial PBA Bar Date Order”), the Court granted the relief requested in the PBA Bar Date Motion and established deadlines and procedures for filing proofs of claim in the PBA Title III Case. In light of the public health emergency created by the spread of COVID-19, the Court subsequently extended this deadline to and including July 29, 2020 at 4:00 p.m. (Atlantic Time), by the *Order (A) Extending Deadlines for Filing Proofs of Claim and (B) Approving Form and Manner of Notice Thereof* [ECF No. 13403] (together with the PBA Initial Bar Date Order, the “PBA Bar Date Orders,” and together with the Commonwealth, ERS, and HTA Bar Date Orders, the “Bar Date Orders”).

**B. Proofs of Claims Filed, Omnibus Objection Procedures, and Claim Objections**

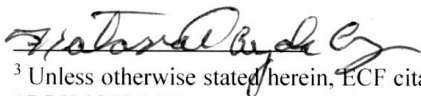
6. To date, approximately 180,483 proofs of claim have been filed against the Debtors and logged by Prime Clerk, LLC. Such proofs of claim total approximately \$43.6 trillion in asserted claims against the Debtors, in addition to unliquidated amounts asserted.

**BACKGROUND**

**A. The Bar Date Orders**

3. On May 3, 2017, the Oversight Board issued a restructuring certification pursuant to PROMESA sections 104(j) and 206 and filed a voluntary petition for relief for the Commonwealth pursuant to PROMESA section 304(a), commencing a case under Title III thereof (the “Commonwealth Title III Case”). On May 21, 2017, the Oversight Board issued a restructuring certification pursuant to PROMESA sections 104(j) and 206 and filed a voluntary petition for relief for ERS and HTA, pursuant to PROMESA section 304(a), commencing a case under Title III thereof (the “ERS Title III Case” and “HTA Title III Case,” respectively). On September 27, 2019, the Oversight Board issued a restructuring certification pursuant to PROMESA sections 104(j) and 206 and filed a voluntary petition for relief for PBA, pursuant to PROMESA section 304(a), commencing a case under Title III thereof (the “PBA Title III Case,” and together with the Commonwealth Title III Case, the ERS Title III Case, and the HTA Title III Case, the “Title III Cases”). On June 29, 2017 and October 9, 2019, the Court entered orders granting the joint administration of the Title III Cases for procedural purposes only. ECF No. 537, ECF No. 8829.<sup>3</sup>

4. On January 16, 2018, the Debtors filed their *Motion for Order (A) Establishing Deadlines and Procedures for Filing Proofs of Claim and (B) Approving Form and Manner of Notice Thereof* [ECF No. 2255] (the “Bar Date Motion”). Pursuant to the *Order (A) Establishing Deadlines and Procedures for Filing Proofs of Claims and (B) Approving Form and Manner of Notice Thereof* [ECF No. 2521] (the “Initial Bar Date Order”), the Court granted the relief



<sup>3</sup> Unless otherwise stated herein, ECF citations refer to documents filed in Bankruptcy Case No. 17 BK 3283-LTS.

**EXHIBIT D**

**Proposed Order**

SO ORDERED.

Dated: 11/Sept/2021

Honorable Judge Laura Taylor Swain  
United States District Judge

*Matanad Byak ay*

SS = 8677

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

*In re:*

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO,

PROMESA  
Title III  
No. 17 BK 3283-LTS  
(Jointly Administered)

as representative of

**This filing relates to the  
Commonwealth, ERS, HTA and PBA.**

THE COMMONWEALTH OF PUERTO RICO,  
*et al.*,

Debtors.<sup>1</sup>

**DECLARATION OF JAY HERRIMAN IN SUPPORT OF THE THREE HUNDRED  
AND EIGHTIETH OMNIBUS OBJECTION (SUBSTANTIVE) OF THE  
COMMONWEALTH OF PUERTO RICO, THE EMPLOYEES' RETIREMENT  
SYSTEM OF THE GOVERNMENT OF THE COMMONWEALTH OF PUERTO RICO,  
THE PUERTO RICO HIGHWAYS AND TRANSPORTATION AUTHORITY, AND THE  
PUERTO RICO PUBLIC BUILDINGS AUTHORITY TO EMPLOYEE CLAIMS  
ASSERTING LIABILITIES OWED BY ENTITIES THAT ARE NOT TITLE III  
DEBTORS**

[Signature]\_\_\_\_\_

<sup>1</sup> The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are (i) the Commonwealth of Puerto Rico (the "Commonwealth") (Bankruptcy Case No. 17 BK 3283- LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Commonwealth of Puerto Rico Government Employees' Retirement System ("ERS") (Bankruptcy Case No. 17 BK 3566- LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority ("PBA", and together with the Commonwealth, COFINA, HTA, ERS, and PREPA, the "Debtors") (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations.)

**EXHIBIT B**

**Declaration of Jay Herriman**

ORDERED that the Three hundred and eightieth Omnibus Objection is GRANTED  
as set forth herein; and it is further

ORDERED that the Claims to Be Disallowed are hereby disallowed in their entirety;  
and it is further

ORDERED that Prime Clerk, LLC, is authorized and directed to delete the Claims to Be  
Disallowed from the official claims registry in the Title III Cases; and it is further

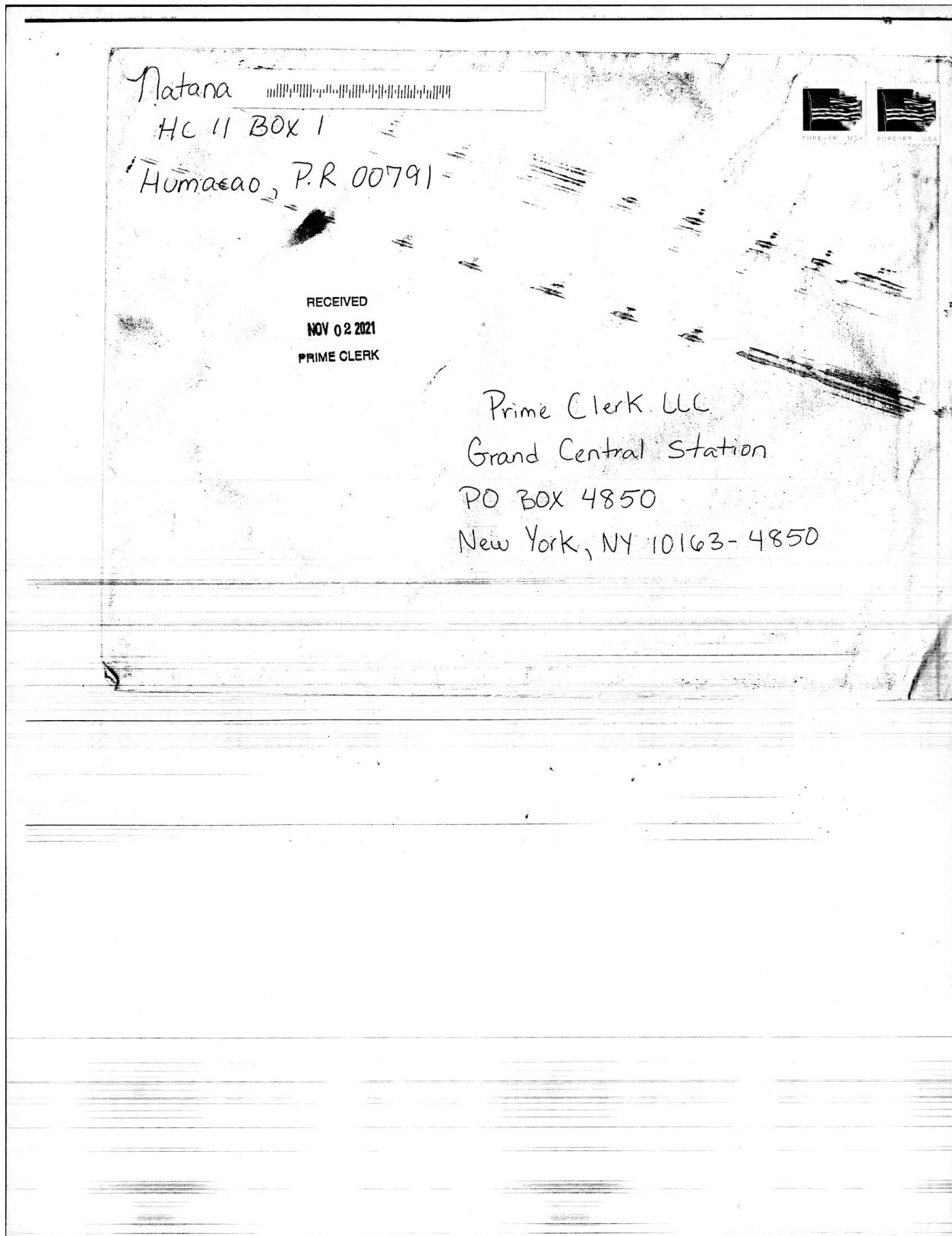
ORDERED that this Court shall retain jurisdiction to hear and determine all matters arising  
from or related to the implementation, interpretation, or enforcement of this Order.

SO ORDERED.

Date: [illegible signature]

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Honorable Judge Laura Taylor Swain  
United States District Judge





T 718.384.8040  
W TargemTranslations.com  
E projects@targemtranslations.com  
A 185 Clymer St. Brooklyn, NY 11211

### TRANSLATOR'S CERTIFICATE OF TRANSLATION

Translation from: Spanish (Puerto Rico) into English (US)

TARGEM Translations Inc.

I, Andreea I. Boscor, ATA-certified Spanish-English #525556, acting as translator at TARGEM Translations Inc., a NEW YORK City corporation, with its principal office at 185 Clymer Street, Brooklyn, NY, 11211, USA, certify that:

the English translated document is a true and accurate translation of the original Spanish and has been translated to the best of my knowledge.

Original Document Name: **Claim No. 172114**

Signed this 29<sup>th</sup> day of December, 2021



Verify at [www.atanet.org/verify](http://www.atanet.org/verify)

A handwritten signature in blue ink, appearing to read 'Andreea I. Boscor'.

Andreea I. Boscor

